

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

MICHAEL COREY JENKINS, ET AL

PLAINTIFFS

V.

CAUSE NO. 3:23-CV-374-DPJ-ASH

RANKIN COUNTY, MISSISSIPPI, ET AL

DEFENDANTS

DEPOSITION OF ALAN JACKSON SCHMIDT

Taken at the offices of Rankin County Sheriff's
Department, 221 North Timber Street, Brandon,
Mississippi, on Wednesday, February 12, 2025, beginning
at approximately 9:16 a.m.

APPEARANCES:

TRENT WALKER, ESQUIRE

Attorney at Law

5255 Keele Street, Suite A

Jackson, Mississippi 39206

PRESENT AND REPRESENTING PLAINTIFF ALAN JACKSON
SCHMIDT

JASON DARE, ESQUIRE

Biggs, Ingram & Solop

Post Office Box 14028

Jackson, Mississippi 39236-4028

PRESENT AND REPRESENTING DEFENDANT RANKIN
COUNTY SHERIFF'S DEPARTMENT

REPORTED BY:

TRUDIE QUINN

Davis Court Reporting

Post Office Box 44

Madison, Mississippi 39130

(601) 454-3298

I N D E X

PAGE

Style, Number and Appearances [1](#)

Index [2](#)

EXAMINATION OF ALAN JACKSON SCHMIDT:

By Mr. Dare [3](#)

Reporter's Page 63

Signature Page 64

Certificate of Reporter 65

- o -

E X H I B I T S

[1](#) - Booking Photo 38

[2](#) - Booking File 42

[3](#) - Partial Transcript 48

- o -

Alan Schmidt - February 12, 2025

3

1 P R O C E E D I N G S

2 ALAN JACKSON SCHMIDT,

3 called as a witness, having been duly sworn,

4 was examined and deposed as follows:

5 EXAMINATION BY MR. DARE:

6 Q. Can you state your full name for the record,
7 please.

8 A. Alan Jackson Schmidt.

9 Q. Spell your last name, just to make sure we
10 got it right.

11 A. S-c-h-m-i-d-t.

12 Q. Mr. Schmidt, have you ever given a deposition
13 before similar to what we're here doing?

14 A. No, sir.

15 Q. So I'm gonna go through just a few ground
16 rules with you. This is similar to court, but as you
17 notice we don't have a judge or a jury here.

18 We do have a court reporter who is taking down
19 everything that I say and everything that you say, and
20 it's all gonna end up on a sheet of paper.

21 To make sure that that sheet of paper is clear on
22 what I'm saying and what you're saying, if you could wait
23 until after I finish asking my question before you
24 answer, that will make everything clear. Is that all
25 right?

Alan Schmidt - February 12, 2025

4

1 A. Yes, sir.

2 Q. Also in Mississippi we have a tendency of
3 saying uh-huh and huh-uh a lot. If you do that I'm gonna
4 ask you to verbalize your response in a yes or no so that
5 that's also clear.

6 A. Yes, sir.

7 Q. And if the answer to this question, it's one
8 that I ask of everybody, but if the answer is yes, I
9 don't want to know what it is, but are you on any type of
10 medication or have you taken anything that would impair
11 your ability to understand my questions or answer
12 truthfully and honestly?

13 A. No, sir.

14 Q. Finally, attorneys have a tendency of asking
15 confusing questions. I'm sure I am guilty of that as
16 well. If you ever don't understand my question, can you
17 ask me to rephrase it? Would that be all right?

18 A. Yes, sir.

19 Q. I will not be offended if you do that,
20 however, if you answer the question that I have on the
21 table I'm gonna presume that you understood the question
22 and answered truthfully and honestly. All right?

23 A. Yes, sir.

24 Q. So I'm not gonna get too far down into this,
25 and I don't want to know anything about underlying facts.

Alan Schmidt - February 12, 2025

5

1 We're taking this deposition here at the Rankin County
2 Sheriff's Department, and you're currently incarcerated
3 in the Rankin County Jail, is that right?

4 A. Yes, sir.

5 Q. What is the charge currently pending against
6 you?

7 A. What do you mean?

8 Q. Why are you here?

9 A. Oh. Why I'm in jail?

10 Q. Yes.

11 A. Just old fines.

12 Q. Prior to coming to jail, where did you live?

13 A. Georgia.

14 Q. Where in Georgia?

15 A. Norman Park.

16 Q. How long did you live in Georgia?

17 A. Just for like two months.

18 Q. What were you doing in Georgia?

19 A. I got reunited with my grandparents who I
20 ain't seen in 17 years, and then I come back here, got
21 pulled over and went to jail.

22 Q. So you were living with your grandparents?

23 A. Yes, sir.

24 Q. Over the past let's say two years, where have
25 you been employed and just generally the names and

Alan Schmidt - February 12, 2025

6

1 locations of your employer?

2 A. Pearl, Mississippi, with Sunbelt Sealing
3 right there on Farish Street, and then Oxford
4 Construction, and then the others I've just been like a
5 handyman.

6 Q. Did you say Sunbelt Sealant?

7 A. Yes, sir.

8 Q. And when you say handyman, what generally do
9 you do?

10 A. Repair the houses, driveways, pools, just
11 electric, light fixtures, stuff like that.

12 Q. Anything that needs to be done basically?

13 A. Yes, sir. Jack of all trades and master of
14 none.

15 Q. Can you provide me the benefit of your
16 educational background?

17 A. Well, I went to Pearl High School to 9th
18 grade, and then from 9th grade I dropped out and went to
19 Youth Challenge Academy, and then that was it.

20 Q. So what is the highest degree that you've
21 achieved?

22 A. GED.

23 Q. When did you obtain that?

24 A. 2012.

25 Q. We're gonna get into a little bit more, but

Alan Schmidt - February 12, 2025

7

1 when you were incarcerated here from '22 to '23, you were
2 in the trustee program as well?

3 A. Yes, sir.

4 Q. Did you take any classes through the trustee
5 program?

6 A. No, sir.

7 Q. Do you still have any family living in and
8 around the central Mississippi area?

9 A. My grandmother.

10 Q. What's her name?

11 A. Mary Ann Pierce.

12 Q. Anybody else?

13 A. My Aunt Louise. Just general family on my
14 mother's side and my two kids, I have two kids.

15 Q. Your Aunt Louise, what's her last name?

16 A. Reel, Louise Reel.

17 Q. R-e-a-l?

18 A. R-e-e-l.

19 Q. Mary Ann, one word, two words?

20 A. Two words. It's A-n-n M-a-r-y.

21 Q. Are either of your children over the age of
22 18?

23 A. No, sir.

24 Q. Who do they live with?

25 A. Their mother.

Alan Schmidt - February 12, 2025

8

1 Q. And what's her name?

2 A. Mary Gregory -- or Mary Thames, my bad. She
3 just got married.

4 Q. You ever been married?

5 A. No, sir.

6 Q. All right. So we're here today about an
7 incident that occurred in December of '22. Prior to that
8 time had you ever been arrested by anybody with the
9 Rankin County Sheriff's Department?

10 A. No, sir.

11 Q. Prior to that time did you even know
12 Christian Dedmon or any of the folks that you had met on
13 I-20?

14 A. Yes, sir. I knew Christian Dedmon, Opdyke
15 and Brett McAlpin. I didn't know Hunter Edward, though.

16 Q. Elward. It's spelled E-l-w-a-r-d. So you
17 did not know Hunter Elward but you knew Opdyke, Dedmon
18 and McAlpin?

19 A. Yes, sir, and then there were two other ones,
20 too. One had a tattoo on his face. I don't know his
21 name. I just remember his tattoo on his face because
22 he's the one that held me in the ants.

23 And there was a black cop there, too, and I
24 believe his name was Andrews. Officer Roosevelt told me
25 that his name was Andrews.

Alan Schmidt - February 12, 2025

9

1 Q. My initial question was had you ever been
2 arrested by anybody with the Rankin County Sheriff's
3 Department before?

4 A. No, sir.

5 Q. Your arrest prior to December of '22 were
6 predominantly with Pearl PD, correct?

7 A. Yes, sir.

8 Q. The arrest prior to December of '22 -- well,
9 had you ever been incarcerated in the Rankin County Jail
10 prior to December of '22?

11 A. Yes.

12 Q. And the arrests were generally from what I've
13 seen -- were they drug related issues?

14 A. No, sir. Well, a couple paraphernalias and
15 then like traffic tickets and DUI, one DUI.

16 Q. So in December of '22 you were pulled over
17 for allegedly stealing a bunch of equipment from an
18 employer, is that right?

19 A. No, sir. I was pulled over for no sticker on
20 the tag.

21 Q. You were eventually charged, though, with
22 stealing a bunch of equipment from an employer?

23 A. Yes, sir.

24 Q. Who was that employer?

25 A. Steven Sandifer.

Alan Schmidt - February 12, 2025

10

1 Q. And what was the equipment that you had
2 stolen?

3 A. It was a broke down generator and Kubota saw,
4 and that's the only thing I took. They said pressure
5 washer, but.

6 Q. Where did the pressure washer go, if you
7 know?

8 A. I never took the pressure washer. I just
9 took the generator and a saw.

10 Q. And you had sold it to a guy named Tom-Tom in
11 Jackson?

12 A. Yes, sir. Name is Thomas Stevens to be
13 correct, but Dedmon already knew the location that Thomas
14 Stevens was at because he's had dealings over here.

15 Q. Thomas Stevens has had dealings over --

16 A. Dealings with narcotics and stuff over here.

17 Q. So Thomas Stevens goes by Tom-Tom, is that
18 right?

19 A. Yes, sir.

20 Q. And how did you know Thomas Stevens?

21 A. Just like a family friend, you know. When I
22 was homeless he was kind of the guy that brought me a
23 plate and some food and socks and clothes and stuff.

24 Q. Okay. How much money or what did you receive
25 in return for the generator and the saw that you had

Alan Schmidt - February 12, 2025

11

1 stolen from Steven Sandifer?

2 A. \$30 of cash and that was it.

3 Q. And did you bring that generator and saw and
4 get the \$30 in cash on the same day that you were
5 arrested, December 4, '22?

6 A. No, sir.

7 Q. When was that done?

8 A. Thanksgiving.

9 Q. Where does Thomas Stevens live?

10 A. I don't know. I no longer talk to him.

11 Q. Where did he live in December of '22?

12 A. On McDowell Road. I believe it was Hill
13 Street but not 100 percent honest.

14 Q. Hill?

15 A. Hill, like H-i-l.

16 Q. How long had you worked for Steven Sandifer?

17 A. I was off and on with him for about six
18 months, you know, a couple of times, you know, not that
19 one time, but it was about six months.

20 Q. And were you still working for him in
21 December of '22?

22 A. No, sir. Well, he didn't fire me yet, so.

23 Q. What were generally your job responsibilities
24 when you were working with Steven Sandifer?

25 A. Laying sewer and water lines.

Alan Schmidt - February 12, 2025

12

1 Q. And when you stole this generator and saw,
2 was that something that you were able to acquire while on
3 the job or did you have a key to get into --

4 A. I had a key to enter.

5 BY MR. WALKER: Wait, wait, wait. Let him
6 ask his question and then answer.

7 Q. Walk me through how you acquired the
8 generator and saw.

9 A. Pulled in the driveway, got the generator, it
10 was beside the building, and then got the key because it
11 was on the outside of the shed and then unlocked the door
12 and grabbed the saw and left.

13 Q. Was this at night?

14 A. Yes, sir.

15 Q. You said before Thanksgiving?

16 A. Yes, sir. Well, it was right on
17 Thanksgiving.

18 Q. Right around that same week of Thanksgiving?

19 A. Yes, sir.

20 Q. Do you think it was before Thanksgiving or
21 maybe after Thanksgiving?

22 A. No. I think it was on Thanksgiving.

23 Q. Like the actual Thanksgiving day?

24 A. Yes, sir, but at night.

25 Q. Was anybody else with you when you stole the

Alan Schmidt - February 12, 2025

13

1 generator and saw?

2 A. Yes, sir.

3 Q. Who?

4 A. Just like a -- she was just a family girl,
5 you know.

6 Q. What's her name?

7 A. I have no clue to be honest. It was like
8 just a one night stand kind of thing, you know.

9 Q. When you say a family girl --

10 A. Well, I mean, she was like a one night stand,
11 just like a friend.

12 Q. But you don't know her name?

13 A. No, sir.

14 Q. Where had you met her on Thanksgiving?

15 A. On Thanksgiving, well, she was just at a
16 friend's house where we hang out and stuff over there,
17 you know.

18 Q. Who?

19 A. Over there near Gallatin.

20 Q. What was the friend's name?

21 A. What was the friend's name?

22 Q. Yes.

23 A. Wayne.

24 Q. Wayne what?

25 A. Wayne Stevens.

Alan Schmidt - February 12, 2025

14

1 Q. And was it this girl's idea to go and steal
2 the generator and saw or how did that plan come about?

3 A. Ran out of gas basically and it was in the
4 area, and Steven owed me money. And I did the wrong
5 thing, you know, going take something instead of waiting
6 for him to pay me my paycheck.

7 Q. All right. So walk me through kind of the
8 plan. You're at Wayne Steven's house, there's some girls
9 over there including the family girl, as you say, you
10 just don't remember her name. How did the plan come
11 about to go over to Mr. Sandifer's and steal equipment?

12 A. Well, we ran out of -- you know, the gas was
13 low and we needed money, and Steven owed me money, too,
14 so that was the only way I knew to get some money, so.

15 Q. Where did you run out of gas?

16 A. Well, I didn't run out of gas all the way. I
17 was in Richland and my gas light was on on the back way
18 of Monterey, and that's the reason I used the gas jug to
19 put gas in the truck.

20 Q. And so you stole this property in Richland,
21 is that right?

22 A. Yes, sir.

23 Q. And where was the facility, where was this
24 property in Richland when you stole it?

25 A. In front of Christian Dedmon's house.

Alan Schmidt - February 12, 2025

15

1 Q. And then you brought it back to McDowell,
2 Hill Street in Jackson?

3 A. Took it to Gallatin and Tom-Tom took it to
4 his house.

5 Q. So when you took it to Gallatin that's when
6 you exchanged the property for the cash?

7 A. Yes, sir.

8 Q. Where on Gallatin?

9 A. Jubilee Street. It's right there by the
10 Shell.

11 Q. You got \$30 worth of gas?

12 A. I got \$30 cash, a 20 dollar bill and a 10
13 dollar bill.

14 Q. What did you use the \$30 for?

15 A. \$10 in gas and then \$10 for some narcotics
16 and \$10 for beer.

17 Q. What kind of narcotics?

18 A. Crack-cocaine, but I no longer do that no
19 more.

20 Q. Who did you buy the crack-cocaine from?

21 A. Tom-Tom.

22 Q. So I guess I'm confused. Did he give you the
23 \$30 in cash and then you gave him some of the cash back
24 for the cocaine?

25 A. Yes, sir. Because like when you bring him

Alan Schmidt - February 12, 2025

16

1 stuff like items and stuff he'll give you cash for it and
2 then do you want to transaction something else, you know,
3 then you just give him his cash back. It's like retail
4 but not legal.

5 Q. What kind of vehicle were you driving on
6 Thanksgiving of '22?

7 A. I believe it was a Sports Edge but I'm not
8 for sure.

9 Q. What's that?

10 A. Like an SUV truck. My bad, it was a Ford
11 Expedition but the truck style.

12 Q. Is that your vehicle?

13 A. Yes, sir.

14 Q. You still own that vehicle?

15 A. No, sir. When Dedmon towed it, you know, it
16 was gone.

17 Q. You never got it back?

18 A. No, sir. I was in jail, so nobody could go
19 get it for me.

20 Q. Where is it now?

21 A. Back at Double D's, Ellis Finance Center.

22 Q. So it was repoed?

23 A. Yes, sir.

24 Q. Did you ever have any conversations with
25 Steven Sandifer between Thanksgiving and December 4th

Alan Schmidt - February 12, 2025

17

1 about who stole property from -- or who stole this
2 generator and saw from his residence or his place?

3 A. No, sir. I just text him and told him I
4 wasn't coming to work because my stomach was upset, and
5 then eventually I didn't show up.

6 Q. When did you text him and say you're not
7 coming to work?

8 A. The day after Thanksgiving.

9 Q. That Friday?

10 A. Yes, sir.

11 Q. Did you ask him on that Friday for the money
12 that he owed you?

13 A. Yes, sir.

14 Q. Did he pay you?

15 A. No, sir.

16 Q. Has he ever paid you even until today's date?

17 A. No, sir.

18 Q. What day of the week was December 4th?

19 A. December 4th was on a Sunday.

20 Q. Did you work at all the Monday through
21 Saturday after Thanksgiving?

22 A. Yes, sir, just like my little AJ Home & Lawn
23 Care.

24 Q. What's the AJ stand for?

25 A. Alan Jackson.

Alan Schmidt - February 12, 2025

18

1 Q. That's what I thought. Have you come across
2 the girl you were with on Thanksgiving again at all since
3 Thanksgiving of '22?

4 A. Yes.

5 Q. Still hadn't gotten her name, though?

6 A. No, sir. To be honest, I can't think of her
7 name.

8 Q. She have a nickname?

9 A. I think it's Peaches, but.

10 Q. Well, did Peaches also use any of the
11 crack-cocaine on Thanksgiving?

12 A. Yes, sir.

13 Q. And have you used crack-cocaine with Peaches
14 since Thanksgiving of '22?

15 A. No, sir.

16 Q. Explain what you were doing generally that
17 Saturday and Sunday leading up to your arrest?

18 A. Well, I was doing my few lawns I had to do
19 and then just hanging out, hanging out with my kids and
20 then, you know, just like.

21 Q. Was crack-cocaine the only drug that you were
22 using back then?

23 A. Yes, sir. That's the only drug I've ever
24 used.

25 Q. And again, back in '22, understand that you

Alan Schmidt - February 12, 2025

19

1 don't do that anymore --

2 A. No, sir. I smoke weed and that's it.

3 Q. -- but how often back in the fall of '22 did
4 you use crack-cocaine?

5 A. Well, the fall of '22 --

6 Q. Thanksgiving '22 to December?

7 A. I relapsed. That's when I relapsed that
8 night, so.

9 Q. And so between Thanksgiving and that whole
10 next week, when you were out doing yard work and you were
11 getting paid, were you turning back around and going and
12 buying crack-cocaine with it?

13 A. Yes.

14 Q. So would you agree with me that you were
15 using pretty frequently pretty much every night for the
16 week leading up to your arrest on December 4th?

17 A. Yes, sir.

18 Q. Had you used crack-cocaine on December 4th,
19 2022, prior to being arrested?

20 A. No, sir.

21 Q. Not at all on that Sunday?

22 A. No, no, sir -- well, earlier that morning but
23 way earlier, because that's when I met Tom-Tom in the
24 parking lot and he told me Dedmon was looking for me.

25 Q. All right. Explain that.

Alan Schmidt - February 12, 2025

20

1 A. Well, we pulled on Valley Street at the
2 church right there and Tom-Tom was like, when you get
3 pulled over just don't say nothing, you know, they're
4 looking for you, you know, just don't be a snitch and I
5 wasn't. Somebody in the hood told on me and told Dedmon
6 where Tom-Tom lived.

7 Q. So from your understanding Dedmon had already
8 gone and obtained all of the property that you had stolen
9 and sold to Tom-Tom by that time?

10 A. No, sir.

11 Q. So somebody else had snitched and said you
12 stole property, sold it to Tom-Tom?

13 A. Yes, sir.

14 Q. And Tom-Tom knew that Dedmon knew?

15 A. Yes, sir.

16 Q. Did Tom-Tom say that he had spoken with
17 Dedmon?

18 A. He didn't say.

19 Q. He just knew somebody had snitched?

20 A. Yes, sir.

21 Q. Now, during your arrest on December 4, 2022,
22 you admitted that you had stole the property, correct?

23 A. No, sir.

24 Q. Never did?

25 A. Never admitted it, no, sir.

Alan Schmidt - February 12, 2025

21

1 Q. When the property was reacquired from Tom-Tom
2 you were in the back of the vehicle?

3 A. No. I was on the outside of the vehicle.

4 Q. But you were at Tom-Tom's place?

5 A. Me and Hunter Edwards was standing at the
6 back of the vehicle in the SUV, the silver one.

7 Q. Right. And did you ever tell anybody that
8 the property was at Tom-Tom's, did you ever say here is
9 where Tom-Tom lives, did you ever say anything to the
10 officers about where that property was?

11 A. No, sir.

12 Q. Do you know as you sit here today how the
13 officers knew that that stolen property was at Tom-Tom's?

14 A. No, sir.

15 Q. But you admit today that you were the one
16 that took the property and you did sell it to Tom-Tom?

17 BY MR. WALKER: Asked and answered.

18 Q. You can answer.

19 A. Yes, sir.

20 Q. Where on I-20 were you when you were first
21 pulled over?

22 A. Right there as soon as you go over the bridge
23 that's where Rankin County turned the lights on, right at
24 Hinds County.

25 Q. Who was the one that pulled you over?

Alan Schmidt - February 12, 2025

22

1 A. I don't know his name. I just know it was
2 that black guy but I believe it was -- I don't know his
3 name.

4 Q. So I guess from the time that you got pulled
5 over to the time that you're getting loaded up into a
6 vehicle, walk me through what you can recall happening?

7 A. Well, on the night of December 4th of 2022, I
8 was going down I-20 and then Rankin County turned their
9 lights on and then -- Andrew was his name.

10 Andrew pulled me out the vehicle, wanted to
11 search the vehicle. He already paged Dedmon to be on the
12 way. Well, when Dedmon got there he pulled in and said
13 bring him over here to my car; brought me to his car.

14 Andrews is the one that handcuffed me. Dedmon
15 then pushed me down and hit my head on the back right
16 fender wheel of the Expedition.

17 And then Brett McAlpin, Hunter Edward and Opdyke
18 all started beating on me, and then after that I looked
19 at them and told them they hit like a female, and then
20 they started hitting on me again.

21 And then after that the guy with the tattoo on
22 his face and a scar right here held me in fire ants, and
23 whole time I'm praying to God because, you know, they
24 were going to kill me and then he tased me three times
25 and then --

Alan Schmidt - February 12, 2025

23

1 Q. He who?

2 A. Christian Dedmon, used Hunter Edward's taser,
3 and then after that we were walking to the car and
4 Christian Dedmon told Hunter Edward to snatch me to my
5 knees.

6 He snatched me to his knees, he pulled his penis
7 out, put it towards my mouth and I held it like this and
8 then threw me on my back and then they threw me in the
9 car.

10 I did leave out in the beginning he did fire his
11 firearm twice by my head. Just when I start talking
12 about it it makes me nervous.

13 Q. So you say a Deputy Andrews. Did the Deputy
14 Andrews ever touch you?

15 A. No, sir. He stood back and just looked, you
16 know, watched.

17 Q. So the only ones that actually touched you
18 were Brett McAlpin, Hunter Elward, Daniel Opdyke and
19 Christian Dedmon?

20 A. Yes, sir, and the guy with the tattoo because
21 he held me in the fire ants.

22 Q. Explain the tattoo on his face?

23 A. It was like a -- you know that movie Hangover
24 how that guy has a tattoo on his face?

25 Q. Mike Tyson?

Alan Schmidt - February 12, 2025

24

1 A. Yes, sir. He had it right here on his face
2 and then a scar right here.

3 Q. So he had a Mike Tyson tattoo on what side of
4 his face?

5 A. Right side of his face, and the left side of
6 his face he had a scar.

7 Q. Explain the scar.

8 A. It was just like on his cheekbone right here.
9 I don't know what it was from or something.

10 Q. So you're pointing from approximately -- and
11 why I'm having this explained more is because the court
12 reporter can't take down you pointing.

13 So you're pointing approximately from your ear
14 all the way down to your chin area and approximately
15 along the lower jaw bone?

16 A. Yes, sir.

17 Q. Was the individual with the Tyson tattoo and
18 the scar on the left side of his face, was he wearing a
19 Rankin County shirt and badge?

20 A. Yes, sir. He was in one of the little Ford
21 Explorers, fully clothed Rankin County. Dedmon was the
22 only one that wasn't.

23 Q. So McAlpin and --

24 A. And McAlpin had pants on and a shirt.

25 Q. So McAlpin and Dedmon had on regular street

Alan Schmidt - February 12, 2025

25

1 clothes?

2 A. Yes.

3 Q. Elward, Opdyke, Andrews and -- I'm just gonna
4 say Tyson Tattoo, had on sheriff's department gear?

5 A. Yes.

6 Q. Now, when you say that Dedmon fired a firearm
7 twice by your head, was that before or after anybody hit
8 you?

9 A. Well, that was when he snatched me down and
10 hit my head on the fender wheel and then shot it by my
11 head twice, and then they started beating on me.

12 Q. What part of your head hit the fender wheel?

13 A. The center part like where your esophagus is.

14 Q. And when you said they beat on you, I presume
15 the they is McAlpin, Elward, Dedmon and Opdyke, is that
16 right?

17 A. Yes, sir.

18 Q. Where were they beating you from your head
19 down?

20 A. Just my face.

21 Q. Only on your face?

22 A. Yes, sir.

23 Q. Did they kick you in the face?

24 A. No, sir.

25 BY MR. WALKER: Yes or no.

Alan Schmidt - February 12, 2025

26

1 BY THE WITNESS: No, sir.

2 BY MR. DARE: He said no.

3 Q. How many times did they hit you in the face?

4 A. To be honest, I don't know.

5 Q. More than 20?

6 A. Probably about 10 or 15.

7 Q. Closed fist or slaps?

8 A. Closed fist.

9 Q. Any of them have like rings on their hands?

10 A. Dedmon did that I can recall, and that's it
11 that I can recall.

12 Q. Do you remember all four of them hitting you
13 in the face or do you just remember all four of them
14 being there?

15 A. I remember all four of them hitting me in the
16 face.

17 Q. You said that Dedmon used Elward's taser to
18 tase you?

19 A. Yes.

20 Q. Was this a probe tase or a drive-stun?

21 A. A probe tase, shot me in my back, middle of
22 my back.

23 Q. Just once?

24 A. Shot me once but tased me three times around
25 10 to 15 seconds approximately.

Alan Schmidt - February 12, 2025

27

1 Q. So each time that you were tased by Hunter
2 Elward's taser with Christian Dedmon using it was
3 approximately 5 seconds?

4 A. Yes. It seemed like 10 to 15 seconds.

5 Q. 10 to 15 seconds total or 10 to 15 seconds
6 per time?

7 A. 15 seconds in all.

8 Q. Gotcha. And were those three times
9 relatively consecutive or were they spaced out?

10 A. They were consecutive.

11 Q. So it was shooting probes into your back, you
12 were being tased, then immediately after that's done
13 another 5 seconds of electricity running through those
14 probes, and then immediately after that's done another 5
15 seconds of electricity running through the probes, is
16 that right?

17 A. Yes, sir.

18 Q. Where were you when you were tased three
19 times approximately?

20 A. On the side of I-20 right by the side of the
21 road.

22 Q. And were you laying faced down when you were
23 first shot with the probes?

24 A. No, sir. I was sitting up like lightheaded
25 because that was after they got done beating on me.

Alan Schmidt - February 12, 2025

28

1 Q. So you were sitting up. Whose vehicle were
2 you behind?

3 A. I was on the ground on the grass and they
4 were all sitting around laughing. I was still praying to
5 God.

6 Q. Were you in handcuffs when you were being
7 tased?

8 A. Yes, sir.

9 Q. Were you in handcuffs when you were beaten
10 for 10 to 15 minutes in the face?

11 A. Yes, sir.

12 Q. And I'm sorry, I said 10 to 15 minutes. You
13 said 10 to 15 times you were hit in the face, is that
14 right?

15 A. Yes, sir.

16 Q. How long did that last?

17 A. Probably like -- to be honest, I don't know.

18 Q. And then at the end of all of that, one, you
19 never told anybody when you were on the side of the road
20 and whether you were being hit in the face or whether you
21 were being tased, or regardless of what was happening you
22 never said, hey, I stole the property, it's over at
23 Tom-Tom's?

24 A. No, sir.

25 Q. Never snitched, you wouldn't do that?

Alan Schmidt - February 12, 2025

29

1 A. No, sir. And Dedmon told me that if I said
2 anything that he would have me killed in the jail, so I
3 just kept my mouth shut.

4 Q. Whose vehicle were you in when you were taken
5 over to Tom-Tom's?

6 A. Christian Dedmon's, the Expedition, silver.

7 Q. Was anybody else in the vehicle?

8 A. Hunter Edward.

9 Q. Who was driving?

10 A. Christian Dedmon.

11 Q. And where was Hunter riding?

12 A. Passenger seat.

13 Q. Where were you riding?

14 A. The back seat.

15 Q. Driver side or?

16 A. Passenger, behind Edward.

17 Q. And you watched as, I guess, Dedmon went up
18 to Tom-Tom's and got the equipment back that had been
19 stolen, right?

20 A. Yes, sir. I was took to the back of the car.

21 Q. Was or either Christian or Hunter abusive to
22 Tom-Tom in getting the equipment back?

23 A. No, sir.

24 Q. They hit him or beat him?

25 A. Not that I recall. I didn't get to see none.

Alan Schmidt - February 12, 2025

30

1 Q. Well, you were standing outside the vehicle
2 watching?

3 A. I was behind Dedmon's car and then Hunter
4 because there was a lot of people running around in the
5 woods and stuff, and then that's when he went and knocked
6 on the door.

7 Q. Was it just Hunter and Christian there or was
8 there anybody else from Hinds County there?

9 A. Yes, sir. There was one Hinds County sheriff
10 but I cannot recall his name.

11 Q. When you pulled up to Tom-Tom's house, were
12 the blue lights going?

13 A. No, sir, just his LED strip.

14 Q. And when you pulled up you saw a bunch of
15 people exit the house and start running?

16 A. Yes, sir. And then Christian Dedmon called
17 Steven's brother to get the equipment, the generator and
18 the saw.

19 Q. Okay. So who was Steven's brother?

20 A. That's Sandifer's Construction. That was my
21 boss Steven.

22 Q. You said called Steven's brother?

23 A. Yes, sir.

24 Q. Who was that?

25 A. I don't know his name.

Alan Schmidt - February 12, 2025

31

1 Q. And then so Steven's brother came to
2 Tom-Tom's and picked up the equipment?

3 A. Yes, sir.

4 Q. And then where did you go?

5 A. I came here.

6 Q. Weren't taken to the hospital or anything
7 beforehand?

8 A. No, sir. He told me he was gonna take me if
9 I had to go. I didn't want to get back in the car with
10 him.

11 Q. So you were immediately booked into the
12 Rankin County Jail then after leaving Tom-Tom's?

13 A. Yes.

14 Q. Had you had a chance to clean up or do
15 anything else between the beating and the tasing and
16 going to Tom-Tom's and then going to jail?

17 A. No, sir.

18 Q. And when you're booked into the Rankin County
19 Jail they typically take a booking photo of you, correct?

20 A. Yes, sir.

21 Q. And so on December 4th of 2022, they did take
22 a booking photo of you, right?

23 A. Yes, sir.

24 Q. They always go through questions with you
25 about are you injured, do you have any injuries that we

Alan Schmidt - February 12, 2025

32

1 should know about, are you taking any medication or
2 anything that we should know about, right?

3 A. Yes, sir, but the seizures part I had them
4 when I was 12 years old. I haven't had none since then.

5 Q. I'm just asking. Booking typically goes over
6 that with you, correct?

7 A. Yes, sir.

8 Q. And that's outside the presence of Christian
9 Dedmon, that's outside the presence of Hunter Elward.
10 You're asked all of those questions by the booking
11 jailer, sergeant, whoever is at the desk, right?

12 A. Yes.

13 Q. You were in jail from December 4 to, I think,
14 July of 2023, is that right?

15 A. Yes, sir.

16 Q. You were also incarcerated in the Rankin
17 County Jail on a Pearl PD hold, is that right?

18 A. Yes, sir.

19 Q. And then the Pearl PD hold, was that the
20 entire time from December until July as well, is that
21 right?

22 A. Yes, sir.

23 Q. What was that from?

24 A. No insurance and no seat belt and following
25 too close to a vehicle.

Alan Schmidt - February 12, 2025

33

1 Q. And you had gotten a bond immediately after
2 being booked in on December 4th?

3 A. Yes.

4 Q. For the felony -- well, what were you charged
5 with?

6 A. For commercial burglary on December 4.

7 Q. And that was a felony commercial burglary?

8 A. Yes, sir.

9 Q. And you were given a \$20,000 bond, I believe?

10 A. Yes.

11 Q. And that occurred almost immediately, right?

12 A. Yes.

13 Q. But you weren't able to bond out?

14 A. No, sir.

15 BY MR. WALKER: Let's go off the record.

16 BY MR. DARE: Sure.

17 (OFF THE RECORD.)

18 Q. (By Mr. Dare) Between the time you got booked
19 in on December 4th, 2022, and July of 2023, had the jail
20 already started using tablets for inmates?

21 A. Yes.

22 Q. And you could submit grievances via tablets,
23 right?

24 A. Yes, sir.

25 Q. If you got any questions about anything that

Alan Schmidt - February 12, 2025

34

1 happens back in jail you've got a tablet and you can send
2 that out, right?

3 A. Yes.

4 Q. And you've got e-mails through your tablet,
5 correct?

6 A. Yes.

7 Q. For those approximately 8 months, you had
8 unlimited phone calls once you became a trustee, correct?

9 A. Yes, and contact visits.

10 Q. And contact visits, yes. I guess one obvious
11 question: Did you enjoy being a trustee?

12 A. Yes, sir. I got to see my grandma.

13 Q. The contact visits were nice, right?

14 A. Yes, sir.

15 Q. Did you go through any of the counseling
16 sessions for drug and alcohol --

17 A. Narcotic anonymous.

18 BY MR. WALKER: Keep your voice up loud
19 enough.

20 BY MR. DARE: Just making sure that the
21 court reporter hears you.

22 BY MR. WALKER: What did you just say?

23 BY THE WITNESS: Narcotic anonymous.

24 Q. And you were able to do that through the
25 trustee program?

Alan Schmidt - February 12, 2025

35

1 A. Yes.

2 Q. Did you do any of the Christian ministry and
3 the spiritual counseling?

4 A. With Brother Aubrey, yes, sir.

5 Q. And for the brief time that you were able to
6 go through those classes and the trustee program while at
7 the Rankin County Jail, do you think that helped in
8 getting you off of crack-cocaine?

9 A. Yes, sir.

10 Q. Have you used since you got out in July of
11 2023?

12 A. Yes, sir.

13 Q. But generally you would say you're --

14 A. I relapsed, yes, sir.

15 Q. But you're a better person after having gone
16 through the trustee program?

17 A. Yes, sir.

18 Q. From December 4 of 2022 to July of 2023, you
19 never told anybody with the sheriff's department about
20 what happened to you on the side of the road on I-20, did
21 you?

22 A. Yes, sir. I told Officer Roosevelt.

23 Q. Officer Roosevelt?

24 A. I believe he was a sergeant.

25 Q. When did that happen?

Alan Schmidt - February 12, 2025

36

1 A. When I became on the road crew.

2 Q. So when did that happen?

3 A. I was in the kitchen for a month. I became
4 trustee in January. So like February-ish, the end of
5 February, somewhere in there.

6 Q. The end of February, and is that when you
7 were put in touch with the FBI and they started
8 investigating everything about that time?

9 A. Yes, sir.

10 Q. Between December 4, 2022, and the end of
11 February of 2023, you never had any contact with anybody
12 at the sheriff's department about what had happened, did
13 you?

14 A. When I was incarcerated, yes, sir, Dedmon
15 when he did the interrogation.

16 Q. No. I meant like telling the sheriff here's
17 what happened.

18 A. I never seen the sheriff.

19 Q. And you never told any of the administrative
20 staff back in the jail here's what happened?

21 A. No, sir. I was scared.

22 Q. And you know that you could submit grievances
23 on the tablets and told somebody here's what happened,
24 right?

25 A. Yes, sir.

Alan Schmidt - February 12, 2025

37

1 Q. And you're saying you never did that because
2 you were scared?

3 A. Well, yes, sir, I was scared, because Dedmon
4 said that he would have somebody kill me inside the
5 Rankin County Jail, so that's why I didn't express my
6 testimony to -- you know -- well, kind of like testimony
7 about what happened to me in there.

8 Q. You didn't tell anybody until the end of
9 February, right?

10 A. Yes, sir.

11 Q. And also at the end of February is about when
12 everything was coming out about the January incident with
13 Mr. Jenkins and Mr. Parker, is that right?

14 A. Yes, sir.

15 Q. So had you already heard everything coming
16 out about the incident with Mr. Jenkins and Mr. Parker
17 and FBI and MBI looking into the five former deputies
18 when you went to Roosevelt and said, hey, yeah, that
19 happened to me, too?

20 A. That was before -- well, yeah, that was
21 after, yes, sir, that was after.

22 Q. And that's basically why when you came
23 forward in February to the road crew manager, Mr.
24 Roosevelt, it was because you saw that come out and you
25 were explaining to him basically me, too, right?

Alan Schmidt - February 12, 2025

38

1 A. Yes, sir.

2 BY MR. DARE: I'm gonna have marked as
3 Exhibit 1 what's Bates Stamped RC1745.

4 (EXHIBIT 1, BOOKING PHOTOGRAPH, WAS MARKED
5 FOR IDENTIFICATION.)

6 Q. Mr. Schmidt, I'm going to hand you what's
7 marked as Exhibit 1 to your deposition. It's a color
8 photograph. What is that?

9 A. What do you mean, what is this paper?

10 Q. Yes.

11 A. This is a definition paper.

12 BY MR. WALKER: Do you know what it is?

13 BY THE WITNESS: No, sir. I don't know
14 what this is.

15 Q. All right. Is that you in the picture?

16 A. Yes, sir.

17 Q. And that's your booking photo from December
18 4th of 2022, is it not?

19 A. Yes, sir.

20 Q. And you notice there's no blood, bruises,
21 anything on your face, is that right?

22 A. Yes, sir. There is no bruises except only
23 right here from the ant bites.

24 Q. So they just didn't hit you hard enough to
25 bruise your face?

Alan Schmidt - February 12, 2025

39

1 A. Well, I did have a yellow mark, it's my bad,
2 just a yellow mark, not a black eye, but you couldn't
3 really tell because my skin, the tan, it was just like
4 yellow bruising.

5 Q. So you're saying that this picture actually
6 reflects there is some yellow bruising around your eyes?

7 A. Yes, sir, right there. You could see it
8 better in the jail.

9 Q. I didn't get into the ant bites, let's go
10 back. When did the ant bites occur in this sequence of
11 events between the beating and the taser and then the --

12 A. It was immediately after the beating.

13 Q. How many times were you bitten?

14 A. It was a lot of ant bites, probably like 10
15 or 15 times, somewhere in there.

16 Q. And you're pointing to your left arm?

17 A. Elbow area.

18 Q. So the left elbow area?

19 A. Yes, sir.

20 Q. And your arm was being held down in an ant
21 pile?

22 A. Yeah, my arm, it was like this, like he had
23 his foot on my head and pushed me down in an ant pile.

24 BY MR. WALKER: Who is he?

25 BY THE WITNESS: The Mike Tyson guy.

Alan Schmidt - February 12, 2025

40

1 Q. The Tyson tattoo?

2 A. Yes, sir.

3 Q. Did anybody say hold him down in an ant pile
4 or anything like that?

5 A. No, sir.

6 Q. Do you have any reason to suspect that the
7 Tyson tattoo deputy knew that there was an ant pile
8 there?

9 A. Yes, sir, because I stated to him that he was
10 getting bit by ants, and he said if he get bit then he's
11 gonna whup my butt even more.

12 Q. Now, I notice you have a fairly elaborate
13 tattoo on the exact same arm that you were being bit by,
14 right?

15 A. Yes, sir.

16 Q. Been bitten by ants before, I've never been
17 tattooed. Which hurts worse?

18 A. Tattoo, depending on where you get it.

19 Q. The tattoos on your hands, what does that
20 say?

21 A. Solo dolo.

22 Q. What does that mean?

23 A. Just like by yourself.

24 Q. Then the 96 on your wrist?

25 A. Yes, sir.

Alan Schmidt - February 12, 2025

41

1 Q. What is that?

2 A. The year I was born and then the cross,
3 another cross and my kids and truly blessed and another
4 cross.

5 Q. I didn't ask. Are you affiliated with any
6 gang?

7 A. No, sir.

8 Q. Never have been?

9 A. No.

10 Q. So when you're being booked in and they're
11 asking you all the medical questions, you have the
12 opportunity to say, yeah, I've got ant bites on my arm,
13 I'm hurt in my face, I got beat up on my face, I've been
14 tased. You got the opportunity at that point to say all
15 of that, right?

16 A. Yes, sir. I did state what happened to me to
17 -- I don't know her name. She has blonde hair, the
18 jailer that booked me in that night.

19 Q. Tommy Hildesheim?

20 A. Yes, sir.

21 Q. Tommy is a female?

22 A. No, sir. Tommy booked me in, but I stated it
23 to the woman that was there with him that night in
24 booking.

25 Q. You said she had blonde hair?

Alan Schmidt - February 12, 2025

42

1 A. Yes, sir. She was a black girl with blonde
2 hair or black woman.

3 BY MR. DARE: I'm gonna have marked as
4 Exhibit 2, RC1930 through 1943.

5 (EXHIBIT 2, BOOKING FILE, WAS MARKED FOR
6 IDENTIFICATION.)

7 Q. All right. I'm gonna hand you what's been
8 marked as Exhibit 2 to your deposition. Take your time
9 and look through those.

10 (OFF THE RECORD)

11 Q. (By Mr. Dare) You had an opportunity to
12 review over Exhibit 2 to your deposition?

13 A. Yes, sir.

14 Q. If you notice, bottom right-hand corner
15 there's Bates stamped numbers on everything, so if I'm
16 referring to a page that's where I'm referring to.

17 Let's first go to RC1932. You notice that under
18 visual assessment number 2: Does inmate have any visible
19 signs of trauma, illness, obvious pain or bleeding
20 requiring immediate medical attention. What is by that?

21 A. No.

22 Q. And you also have the opportunity to sign
23 this document and you did in fact sign this document
24 although not the one that's on Exhibit 2, is that right?

25 You typically go through when you're going

Alan Schmidt - February 12, 2025

43

1 through the booking process and they ask you all these
2 medical questions, you sign at the bottom saying that
3 everything is true and correct, is that right?

4 A. Correct, but you don't sign the visual
5 assessment, you don't sign that paper that I'm aware of.

6 Q. It says: I certify that I have truthfully
7 answered these questions about my health?

8 A. Yes, but I'm saying you don't -- see it was
9 like them saying if I had any bodily damage or anything
10 on my face, you know, and my arm. That you don't see.

11 Q. And they said you didn't have any signs of
12 poor skin condition or rashes or needle marks. It did
13 say that you appeared under the influence of drugs or
14 alcohol and the explanation that you were under -- it
15 appeared, though, you were under the influence of drugs,
16 is that right?

17 A. Correct.

18 Q. And were you under the influence of drugs
19 when you were booked in on December 4, 2022?

20 A. No, sir.

21 BY MR. WALKER: Asked and answered. You've
22 answered already.

23 Q. All right. So flipping back to Christian
24 Dedmon's narrative statement. This is RC1942. You had
25 the opportunity to read that, have you not?

Alan Schmidt - February 12, 2025

44

1 A. Correct.

2 Q. And so the evidence was one STIHL cut-off saw
3 valued at \$1500; one Storm Responder generator valued at
4 \$1200, and a Makita drill set valued at \$250 and
5 miscellaneous tools. One, did I read that correctly?

6 A. Correct, yes, sir.

7 Q. But you say that you only stole the saw and
8 generator, is that right?

9 A. Correct, yes, sir.

10 Q. You notice on here that it doesn't have
11 anything about taser use or beatings or a penis being
12 pulled out or anything like that, is that right?

13 A. Yes, sir, because he's not gonna put
14 something that he done wrong to someone, you know, until
15 you have the FBI sit down at them.

16 Q. If there's not a use of force report done and
17 there's nothing in the incident report and if you don't
18 say anything, explain for me how the sheriff is supposed
19 to know that an incident happened, if you know?

20 BY MR. WALKER: Object to the form of the
21 question. It calls for speculation. You can
22 answer if you know.

23 BY THE WITNESS: I don't know. I've never
24 seen the sheriff, you know, besides at Christmas,
25 you know, being incarcerated.

Alan Schmidt - February 12, 2025

45

1 Q. The sheriff comes by and brings Christmas
2 presents for you and has?

3 A. \$25 basket.

4 Q. Right, and also allows you to give Christmas
5 presents to your kids, correct?

6 A. Through Brother Aubrey, yes.

7 Q. And the sheriff himself has been nothing but
8 good to you while you've been incarcerated, right?

9 BY MR. WALKER: Object to the form. You
10 can answer if you know.

11 BY THE WITNESS: Like I said, I've never
12 seen the sheriff, you know, other than besides at
13 Christmas, you know. But Captain Bond was, you
14 know, and Ms. Mindy, they were good.

15 Q. Everybody at the jail has been good to you?

16 A. Yes, sir, besides the sheriff, the people in
17 the car like the patrol people.

18 Q. Dedmon, McAlpin, Elward and Opdyke?

19 A. Yes, sir.

20 Q. And the Tyson tattoo. Andrews didn't do
21 anything but he was just there?

22 A. Yes, sir.

23 Q. The black deputy, did he do anything or was
24 he just there, too?

25 A. He was just there.

Alan Schmidt - February 12, 2025

46

1 BY MR. WALKER: For the record, is Andrews
2 the black deputy?

3 BY MR. DARE: No.

4 BY MR. WALKER: Okay. I was a little
5 confused about that.

6 Q. Well, I guess I'll let you answer. Was
7 Andrews the black deputy?

8 A. That's what I was told his name by a white
9 fellow, you know, because I don't know his name, you
10 know. If I seen him in a lineup I could point him out.

11 Q. So you've read through RC1942. Other than
12 omitting any beatings or tasers or the sexual aspect of
13 your arrest, was everything else in RC1942 true, accurate
14 and correct?

15 A. No, sir.

16 Q. What do you see wrong in here?

17 A. Well, the evidence is wrong.

18 Q. Okay. What else?

19 A. And then what he did to me that night should
20 have been in there, you know, but he didn't put that in
21 there.

22 Q. Understood. And that's why I clarified other
23 than --

24 A. And the part right here where I was on
25 Pearson Road in the city of Pearl, because I went to

Alan Schmidt - February 12, 2025

47

1 Wendy's and the city of Pearl police got behind me and
2 called Rankin County in, and Pearl followed me until
3 Rankin County got there when Rankin County threw its
4 lights on at the bridge.

5 Q. Did you see anything else wrong with 1942,
6 RC1942 on [Exhibit 2](#)?

7 A. Where he said I made a driver's side approach
8 coming in contact with a white male identified as Alan
9 Schmidt. He didn't do the initial stop.

10 Q. Anything else?

11 A. No, sir.

12 Q. You were at Dedmon's sentencing, were you
13 not?

14 A. No, sir, I was not.

15 Q. Did you give a statement at all during the
16 sentencing?

17 A. Yes, sir. I presented it via to the Court.

18 Q. It was a written statement?

19 A. Yes, sir, it was written.

20 Q. Have you seen any transcripts from Dedmon's
21 sentencing? Were you able to watch it on TV or do you
22 know anything about the sentencing when Dedmon was able
23 to speak and --

24 A. Dedmon declined the sexual assault.

25 Q. Well, not only that he said all he did was

Alan Schmidt - February 12, 2025

48

1 shoot a gun beside your head, right?

2 A. I don't know --

3 Q. I'm not saying it's right or wrong.

4 BY MR. DARE: I'll tell you what, let's
5 have marked as Exhibit 3 the transcript of
6 sentencing.

7 (EXHIBIT 3, PARTIAL TRANSCRIPT, WAS MARKED
8 FOR IDENTIFICATION.)

9 Q. I'm gonna hand you what's been marked as
10 Exhibit 3 to your deposition. Flip over for me, I've got
11 some highlighted starting on page 25.

12 And this is a continuation from page 24, and this
13 is Dedmon giving a statement to the Court. The
14 highlighted portion is where I specifically want to draw
15 your attention.

16 It says: (Reading) With respect to the I-20
17 incident, sir, the things I pled guilty to against Mr.
18 Schmidt I did; I shot into the ground to scare him to
19 tell me where the stolen property was of a very close
20 family member of mine; it's something I take full
21 responsibility for doing that and I know that it's wrong;
22 but respectfully, sir, the sexual assault just did not
23 happen; I'm sorry, that's just a lie. One, did I read
24 that correctly?

25 A. You read that correctly.

Alan Schmidt - February 12, 2025

49

1 Q. And it's your testimony here today that even
2 then Dedmon was lying, that the sexual assault did in
3 fact occur?

4 A. Correct.

5 Q. And that the beating occurred?

6 A. All of it occurred, the sexual assault and
7 the beating, but Dedmon declining it but he pled to it in
8 August, and then they set his court date over again.

9 Q. And you understand that with so many
10 contradicting statements, Dedmon saying that you're
11 lying, you're saying that Dedmon's lying, it's difficult
12 to know who's telling the truth, right?

13 BY MR. WALKER: Object to the form.

14 Q. You would agree with me for someone who
15 wasn't there, it's difficult to know who's telling the
16 truth, right?

17 BY MR. WALKER: Same objection. You can
18 answer.

19 Q. You can answer.

20 A. Correct, I guess, I mean.

21 Q. You were seen by medical the day after being
22 booked into the jail, were you not?

23 A. Correct.

24 Q. And would you be surprised to note that the
25 full medical assessment didn't have any bumps or bruises

Alan Schmidt - February 12, 2025

50

1 or anything on your face?

2 A. Correct, besides I had yellow bruising under
3 my eyes.

4 Q. And that should be reflected in your medical
5 records, correct?

6 A. Yes, sir.

7 BY MR. WALKER: Object to the form.

8 Q. And if it's not then the nurse just missed
9 it?

10 BY MR. WALKER: Same objection. You can
11 answer if you know.

12 Q. You can answer it.

13 A. I guess, I mean, but you can rewind the
14 cameras in 219 east and see it better than that picture
15 probably.

16 Q. Well, the nurse should have been able to see
17 it if he or she is standing right in front of your face,
18 right?

19 A. Correct.

20 BY MR. WALKER: Same objection.

21 Q. Did you have any other bumps or bruises
22 anywhere on your body other than the yellowing underneath
23 your eyes?

24 A. No, sir. But she did give me antibiotic
25 cream for the ant bites.

Alan Schmidt - February 12, 2025

51

1 Q. All right. So you're here being represented
2 by Mr. Walker, correct, Trent Walker?

3 A. Yes, sir.

4 Q. Why is it that you needed representation for
5 this deposition?

6 BY MR. WALKER: Objection.

7 Q. If you know.

8 BY MR. WALKER: Well, I'm gonna object. I
9 guess the long and short of it is I represent him,
10 he's my client and, therefore, any deposition that
11 he participates in then I will be there to
12 participate.

13 BY MR. DARE: Understood.

14 BY MR. WALKER: So I guess my formal
15 objection is that's something that calls for a
16 legal conclusion that he's not qualified to give
17 but I am.

18 Q. What I'm trying to get at, you haven't filed
19 a lawsuit against Christian Dedmon or Brett McAlpin or
20 any of those individuals, have you?

21 BY MR. WALKER: Not yet.

22 Q. I'm gonna have to get you to answer.

23 A. He's the lawyer. I don't know.

24 Q. Did you retain Mr. Walker to file a lawsuit
25 against those guys for what they did to you?

Alan Schmidt - February 12, 2025

52

1 BY MR. WALKER: You can answer that.

2 BY THE WITNESS: To be honest if you want
3 the totally truth of it is --

4 BY MR. WALKER: Stop. Answer the question
5 you are being asked.

6 BY THE WITNESS: It's to be able to make
7 Rankin County stop beating on me, you know, people
8 basically, you know.

9 Q. So the only individuals that you know to have
10 ever beaten on somebody with Rankin County are
11 incarcerated, right?

12 A. Correct.

13 Q. And they're incarcerated for quite some time,
14 right?

15 A. Correct.

16 Q. They're not gonna be beating on anybody in
17 the future unless it's in the jail cells where they are,
18 right?

19 A. Correct.

20 Q. And the intent of any lawsuit that you would
21 have against Rankin County would be to prevent that in
22 the future, is that right?

23 BY MR. WALKER: Same objection that I made
24 earlier. It calls for a legal conclusion, but you
25 can answer.

Alan Schmidt - February 12, 2025

53

1 Q. Why would you want to sue Rankin County?

2 A. Well, for one to -- to be honest I don't
3 know. I mean, they done wrongfully to me that night, you
4 know. I went through a lot of pain and suffering and I
5 steadily go through it daily especially when I see the
6 badges, you know.

7 Q. And if the individuals with Rankin County who
8 had a badge committed a criminal act against you, which
9 they pled to, right?

10 A. Yes, sir.

11 Q. They are in fact doing time as criminals, are
12 they not?

13 BY MR. WALKER: Object to form. You can
14 answer.

15 BY THE WITNESS: Only because the FBI got
16 involved.

17 Q. And do you know who got the FBI involved?

18 A. I believe it was Opdyke.

19 Q. And where did you get that belief from?

20 A. I can't -- I ain't gonna say.

21 BY MR. WALKER: You can answer the question
22 if you know the answer.

23 BY THE WITNESS: I don't know the answer.

24 Q. So you don't know. Do you know who got the
25 Mississippi Bureau of Investigation involved?

Alan Schmidt - February 12, 2025

54

1 A. No, sir.

2 Q. And would you be surprised to note that it
3 was actually the Rankin County Sheriff's Department and
4 Sheriff Bailey who got MBI involved in investigating,
5 would you be surprised to know?

6 A. I don't know. I wouldn't be surprised, I
7 mean, but.

8 Q. You would not be surprised?

9 A. Well, because they've always -- it's numerous
10 things of continuous beating, you know. So it's not like
11 the first time happening.

12 BY MR. WALKER: Let's go off the record.

13 (OFF THE RECORD.)

14 BY THE WITNESS: I don't know.

15 Q. (By Mr. Dare) Sheriff Bailey has never done
16 anything wrong against you to your knowledge, has he?

17 BY MR. WALKER: Object to the form of the
18 question. You can answer if you know.

19 BY THE WITNESS: I don't know.

20 Q. You don't know if he's ever done anything
21 wrong against you?

22 A. Never physically done nothing wrong to me,
23 no. I will say I have seen Bryan Bailey on Gallatin
24 Street where I was, you know, but never made contact with
25 me.

Alan Schmidt - February 12, 2025

55

1 Q. When you said physically has --

2 A. Driving his -- it was a silver Expedition he
3 was in.

4 Q. Has Bryan Bailey ever arrested you?

5 A. No, sir.

6 Q. Bryan Bailey ever beat you?

7 A. Only thing I've ever done was shake his hand
8 at Christmas, you know, that's it.

9 Q. So only thing Bryan Bailey has ever done for
10 you is give you Christmas gifts through Brother Aubrey?

11 A. Well, through Brother Aubrey, but if you're
12 wanting to get to what I'm trying to say is I believe he
13 did know that Christian Dedmon did that stuff that night,
14 you know. I do 100 percent believe it, not into detail
15 that he didn't know what they did but he knew most of it.

16 Q. And is that because of what you've read in
17 the paper?

18 A. Well, media does lie.

19 Q. I agree.

20 BY MR. WALKER: Go ahead, answer the
21 question.

22 BY THE WITNESS: I don't know. You got to
23 help me.

24 BY MR. WALKER: I can't help you. You have
25 to answer the question you're being asked. If I

Alan Schmidt - February 12, 2025

56

1 have an objection I'll make it.

2 Q. Your belief, is it coming anywhere other than
3 what you've read in the media?

4 A. Yeah. Basically, yes, sir.

5 Q. All right. So where else is it coming from
6 besides the media?

7 A. I don't know. I don't want to answer that.

8 Q. You got to answer.

9 A. Oh, I got to answer?

10 Q. You can tell me it's not coming from anywhere
11 else and we can move on or you can tell me it's coming
12 from some other source.

13 A. It's coming from some other source.

14 Q. What is that other source?

15 A. Just other people and the things that they've
16 been through with the sheriff's department that's
17 happened yearly through the years.

18 Q. That you've personally spoken with?

19 A. I've personally spoken with, yes, sir.

20 Q. Were those meetings set up by the individuals
21 with the New York Times?

22 A. No, sir.

23 Q. Were these meetings --

24 A. Friends.

25 Q. Okay. So this is Tom-Tom and?

Alan Schmidt - February 12, 2025

57

1 A. Not Tom-Tom but people in Pelahatchie, Pearl,
2 Brandon, Flowood.

3 Q. And they've mentioned Sheriff Bailey
4 specifically?

5 A. Only one incident and that was in the Puckett
6 one, that's the only time I was acknowledged that, what
7 they've told me, you know, but that goes he say she say,
8 you know.

9 Q. What we call hearsay, right? You've heard
10 that term, right?

11 A. Yes, sir.

12 Q. I want to know from your own personal
13 experiences other than trying to help you while you're in
14 the jail, has Bryan Bailey done anything to you to hurt
15 you?

16 BY MR. WALKER: Objection. Asked and
17 answered at least twice.

18 Q. Yes or no? You're shaking your head no.

19 BY MR. WALKER: You can answer the
20 question.

21 BY THE WITNESS: No.

22 BY MR. DARE: Give me about 2 minutes. I'm
23 gonna go through my notes and I think we might be
24 done.

25 (OFF THE RECORD)

Alan Schmidt - February 12, 2025

58

1 Q. (By Mr. Dare) Who pulled the taser probes out
2 of your back?

3 A. To be honest, I don't know. They were
4 throwing them from the side, you know.

5 Q. On the side of I-20?

6 A. Yes, sir. As soon as you go over the bridge,
7 right there.

8 Q. When you were pulled over, where were you
9 coming from?

10 A. Wendy's.

11 Q. Where were you going to?

12 A. Gallatin Street.

13 Q. And all of the actions that you've been
14 referring to, the beatings and the tasing and the hitting
15 your esophagus on the bumper that all --

16 A. Not the bumper, the fender wheel.

17 Q. The fender wheel?

18 A. Yes, sir.

19 Q. That all occurred on the side of I-20 in the
20 grass?

21 A. Yes, sir. Well, Dedmon's car wasn't in the
22 grass, it was the edge of the road.

23 Q. What fender wheel?

24 A. The right back passenger.

25 Q. Who handcuffed you?

Alan Schmidt - February 12, 2025

59

1 A. Who handcuffed me, the black cop. I don't
2 mean to say it like that but I don't know his name,
3 African-American.

4 Q. Who unhandcuffed you?

5 A. The jail.

6 Q. So they had this other deputy's keys?

7 A. No. Christian Dedmon uncuffed me coming into
8 the jail.

9 Q. So Dedmon had the other deputy's keys?

10 A. I don't know. I don't know how the cuffs
11 work.

12 Q. How many different vehicles were out there
13 when the beatings and the tasings were going on?

14 A. Like three or four and then Pearl police was
15 at the top of the hill.

16 Q. McAlpin was in his own vehicle?

17 A. Yes.

18 Q. And Opdyke was in his own vehicle?

19 A. Yes.

20 Q. And then Andrew had his own vehicle?

21 A. And Hunter had his.

22 Q. And Hunter had his own vehicle and Christian
23 had his own vehicle?

24 A. Yes.

25 Q. And then Tyson tattoo had his own vehicle?

Alan Schmidt - February 12, 2025

60

1 A. Yes, sir.

2 Q. So there were six different vehicles?

3 A. Six vehicles, yes, sir. And Hunter left his
4 vehicle there, called the S.O. shots, called it back in,
5 and one of the deputies stayed there until the vehicle
6 got, I guess, towed back there.

7 Q. You ever been in a fight before?

8 A. Have I ever been in a fight?

9 Q. Yes.

10 A. Yes, sir.

11 Q. You ever lost a fight?

12 A. Yes, sir.

13 Q. I'm sure you've won a couple of fights, too?

14 A. Yes.

15 Q. When you're looking at pictures of people
16 that have been in a fight and they lost and they got hit
17 especially 10 to 15 times, they don't typically look like
18 [Exhibit 1](#), do they?

19 BY MR. WALKER: Object to speculation. Go
20 ahead. You can answer if you know.

21 BY THE WITNESS: The picture does not
22 disclose -- I don't know the correct words, but the
23 picture does not show what I'm trying to say.

24 Q. It doesn't show any injuries, does it?

25 BY MR. WALKER: Object to the form.

Alan Schmidt - February 12, 2025

61

1 BY THE WITNESS: No, it doesn't show the
2 true what happened. Like the quality of the
3 picture is not good.

4 Q. So if I get the actual photographic picture
5 --

6 A. You could probably zoom and see the black
7 eyes, you know, the yellow bruising.

8 Q. And the folks that you've seen getting beat
9 up or when you lost a fight in the past, did you actually
10 have to zoom up and look at somebody to tell that they
11 have been beaten up?

12 BY MR. WALKER: Object to speculation. You
13 can answer.

14 Q. Life history?

15 A. To an extent because they can hit you in
16 certain ways or something, but they were doing it all
17 police brutality.

18 Q. And it's gonna be your testimony that Exhibit
19 1 represents the way you looked after being hit 10 to 15
20 times by four different officers?

21 A. It happened, it did. That's my right hand on
22 the Bible.

23 Q. You were already sworn in at the beginning of
24 the deposition, so. I appreciate your time here today.

25 BY MR. DARE: I'm gonna tender the witness.

Alan Schmidt - February 12, 2025

62

1 BY MR. WALKER: No questions.

2 BY MR. DARE: Read and sign?

3 BY MR. WALKER: Yes.

4 BY MR. DARE: We're off.

5 (CONCLUDED 11:04 A.M.)

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

Alan Schmidt - February 12, 2025

63

1 R E P O R T E R ' S P A G E

2 I, Trudie Quinn, in and for the State of
3 Mississippi, the officer, before whom this sworn
4 testimony was taken, do hereby state on the record:

5 That due to interaction in the spontaneous
6 discourse of this proceeding, dashes (--) have been used
7 to indicate pauses, changes in thought, and/or
8 talk-overs; that same is the proper method for a court
9 reporter's transcription of proceeding; that the dashes
10 (--) do not indicate that words or phrases have been left
11 out of this transcript, and that any words and/or names
12 which could not be verified through reference material
13 have been denoted with the phrase (phonetic).

14 * * *

15

16

17

18

19

20

21

22

23

24

25

CERTIFICATE OF DEPONENT

DEPONENT: Alan Jackson Schmidt
 DATE: February 12, 2025
 CASE STYLE: Jenkins, et al v. Rankin County, et al
 ORIGINAL TO: Jason Dare

I, the above-named deponent in the deposition taken in the herein styled and numbered cause, certify that I have examined the deposition taken on the date above as to the correctness thereof, and that after reading said pages, I find them to contain a full and true transcript of the testimony as given by me.

Subject to those corrections listed below, if any, I find the transcript to be the correct testimony I gave at the aforementioned time and place.

Page	Line	Comments
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

This the _____ day of _____, 2025.

 WITNESS

State of Mississippi
 County of _____

Subscribed and sworn to before me, this the
 _____ day of _____, 2025.

My Commission Expires:

 Notary Public

C E R T I F I C A T E

I, Trudie Quinn, Court Reporter and Notary Public, in and for the State of Mississippi, hereby certify that the foregoing contains a true and correct transcript of the proceedings as taken by me at the time and place heretofore stated and later reduced to typewritten form by computer-aided transcription under my supervision and to the best of my skill and ability.

I further certify that the witness was placed under oath to truthfully answer the questions in this matter.

I further certify that I am not in the employ of or related to any counsel or party in this matter and have no interest, monetary or otherwise, in the final outcome of the proceedings.

Witness my signature and seal, this the 20th day of February 2025.



TRUDIE QUINN
CCR# 1368

My commission expires:
September 8, 2027